

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Louis E. Gulley, )  
                        )  
                        )  
Plaintiff,           )  
                        )  
                        )  
vs.                   ) Case No. 17-cv-08209  
                        )  
                        )  
Dr. Jonathan Kelly, ) Honorable Edmond E. Chang  
                        )  
                        )  
Defendant.           )

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

Movants William D. Heinz and Richard P. Steinken respectfully move this Court for leave to withdraw as counsel of record for Plaintiff Louis E. Gulley. In support of their motion, Movants state as follows:

1.       On June 16, 2020, William D. Heinz was appointed by this Court to represent Plaintiff Louis E. Gulley in the District Court in his 1983 action.
2.       On September 6, 2022, final judgment was entered in this litigation in the U.S. District Court.
3.       Court-appointed trial counsel have duly advised Plaintiff Louis E. Gulley of his right to file an appeal in the District Court and the appellate time limits.
4.       Court-appointed counsel have also advised Plaintiff Louis E. Gulley of his ability to seek the appointment of counsel on appeal.

Wherefore, Movants respectfully request entry of an order granting their leave to withdraw their appearance as counsel of record for Plaintiff Louis E. Gulley.

Dated: September 9, 2022

Respectfully submitted,

By: /s/ William D. Heinz  
One of the Attorneys for Plaintiff

William D. Heinz  
[wheinz@jenner.com](mailto:wheinz@jenner.com)  
Richard P. Steinken  
[rsteinken@jenner.com](mailto:rsteinken@jenner.com)  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, Illinois 60654-3456  
Tel: 312-222-9350

**CERTIFICATE OF SERVICE**

I, William D. Heinz, an attorney, certify that I caused a copy of the foregoing Motion for Leave to Withdraw As Counsel of Record upon all counsel of record via the ECF Pacer system on September 9, 2022, and by UPS to Plaintiff Louis E. Gulley.

/s/ William D. Heinz